

## Retrial - Joint Pretrial Order

*State of Washington v. The GEO Group, Inc., No. 3:17-cv-05806-RJB**Nwauzor et al. v. The GEO Group, Inc., No. 3:17-cv-05769-RJB*United States District Court  
for the Western District of Washington, Tacoma**Plaintiffs' Exhibits**

\*Exhibits below are jointly proposed by the State of Washington and Private Plaintiffs except where "Nwauzor Only" is indicated. If "Nwauzor Only" is indicated, the exhibit is proposed by Private Plaintiffs only. Other exhibits to be used for Phase 2 and/or Phase 3 only are identified as such. Exhibits marked in yellow raise contested issues between the parties that should be resolved by MILs. If the parties are unable to agree about whether certain documents should be removed after the rulings on the MILs or at the pretrial conference these exhibits should be addressed at a subsequent conference or at trial when the full context is available to the Court.

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
1	6/21/2017 Email from James Black (with attachment) <b>GEO-State 036415 – 036420</b>	Stipulated	Stipulated		
2	GEO NWDC Policy and Procedure Manual- 5.1.2 Voluntary Work Program. Effective: 4/13/2015. <b>GEO-State 003451-003458</b> <b>Dep. Exhibit 2 30(b)(6) Kimble (Also Dep. Exhibit 313 Tracy)</b>	Stipulated	Stipulated		
3	Detainee Job Descriptions- Cook/Prep/Server, Dishwasher/Pots & Pans, Laundry Worker <b>GEO-State 015099-005101, GEO-State 003524</b> <b>Dep. Exhibit 3 30(b)(6) Kimble</b>	Stipulated	Stipulated		
4	Detainee Kitchen Worker Hygiene and Grooming Standards <b>GEO-State 003519</b> <b>Dep. Exhibit 4 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 701, 802, F	

5	Kitchen Worker Orientation Packet <b>GEO-State 003538-003556</b> <b>Dep. Exhibit 5 30(b)(6) Kimble</b>	Stipulated	Stipulated	C: (page 003556)	
6	Daily Work Crew Count Sheet – Blank <b>Dep. Exhibit 6 30(b)(6) Kimble</b>	Stipulated	Stipulated		
7	03-07-2018 GEO VWP Memo <b>GEO-State 047868</b>	Stipulated	Disputed	FRE 401/402, 701, 802, F	
8	NWDC Food Service Shift Tool Control <b>GEO-State 003515-003516</b> <b>Dep. Exhibit 8 30(b)(6) Kimble</b>	Stipulated	Stipulated		
9	NWDC Offender Job/Program Assignments <b>Dep. Exhibit 9 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
10	Lieutenant in Tacoma, WA job posting <b>WA00003531-3534</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
11	City of Tacoma Certificate of Compliance <b>Dep. Exhibit 11 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
12	NWDC Housekeeping Plan <b>GEO-State 000632-000635</b> <b>Dep. Exhibit 12 30(b)(6) Kimble</b>	Stipulated	Stipulated		
13	6/21/2017 Email from Steven Miskimens <b>GEO-State 036785-036787</b>	Stipulated	Stipulated		
14	4/12/2012 Memorandum from Classification to Associate Warden McHatton <b>GEO-State 003477</b> <b>Dep. Exhibit 14 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	

15	10/3/2014 Email from Bill McHatton to Alisha Singleton, Michael Heye <b>GEO-State 012190</b> <b>Dep. Exhibit 15 30(b)(6) Kimble</b> <b>(Also Dep. Exhibit 100 Singleton)</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
16	3/4/2014 Email from Bill McHatton to Lowell Clark <b>GEO-State 006269-006270</b> <b>Dep. Exhibit 16 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
17	PBNDS 2011 – 5.8 Voluntary Work Program <b>Dep. Exhibit 17 30(b)(6) Kimble</b>	Stipulated	Stipulated		
18	NWDC Facility History <b>GEO-State 005744-005748</b> <b>Dep. Exhibit 18 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
19	NWDC Detainee Handbook 2016 - Spanish - Unsigned <b>GEO-State 242377-242419</b>	Stipulated	Stipulated		
20	Chart of Hours Worked and Number of Workers <b>GEO-State 019281</b> <b>Dep. Exhibit 20 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
21	Worker Pay Chart by Month <b>GEO-State 019283</b> <b>Dep. Exhibit 21 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
22	VWP Program Spend by Month 2006-2016 <b>GEO-State 019286 (printed from .xls)</b> <b>Dep. Exhibit 22 30(b)(6) Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
23	Volunteer Work Program Agreement signed by Fernando Aguirre-Urbina. 10/24/17 <b>Dep. Exhibit 23 Aguirre</b>	Stipulated	Stipulated		
24	Detainee Signed VWP Agreement <b>GEO-State 265131</b>	Stipulated	Stipulated		
25	Laundry Photograph <b>WA00030816</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

26	1-797 Notice of Action from U.S. Citizenship and Immigration Services approving the application for employment authorization of an individual detained in the Northwest Detention Center (NWDC) <b>WA00003798</b>	Stipulated	Disputed		
27	GEO Corporate Policy and Procedure Manual - 4.3.1: Food Service Management Procedure, Effective 4/18/14 <b>GEO-State 009379-009381</b> <b>Dep. Exhibit 28 Henderson</b>	Stipulated	Stipulated		
28	GEO NWDC Policy and Procedure Manual - 8.1.1-A: Food Service Operations, Effective: 4/13/2015 <b>GEO-State 009340-009374</b> <b>Dep. Exhibit 27 Henderson</b>	Stipulated	Stipulated		
29	PBNDs 2011 Revised 2016 4.1 Food Service <b>Dep. Exhibit 29 Henderson</b>	Stipulated	Stipulated		
30	Laundry Photograph <b>WA00030742</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
31	Summary of Daily Briefing <b>GEO-State 029341-029342</b> <b>Dep. Exhibit 31 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
32	2007 NWDC Year End Report <b>GEO-State 029720-029740</b> <b>Dep. Exhibit 32 Henderson</b>	Stipulated	Stipulated		
33	2009 NWDC Year End Report <b>GEO-State 029765-029785</b> <b>Dep. Exhibit 33 Henderson</b>	Stipulated	Stipulated		
34	2010 NWDC Year End Report <b>GEO-State 029786-029806</b> <b>Dep. Exhibit 34 Henderson</b>	Stipulated	Stipulated		
35	2013 NWDC Year End Report <b>GEO-State 029807-029833</b> <b>Dep. Exhibit 35 Henderson</b>	Stipulated	Stipulated		

36	2014 NWDC Year End Report <b>GEO-State 029834-029859</b> <b>Dep. Exhibit 36 Henderson</b>	Stipulated	Stipulated		
37	GEO Group's Standards Compliance Checklist <b>GEO-State 241855-241875</b> <b>Dep. Exhibit 37 Henderson</b>	Stipulated	Stipulated		
38	10/23/2012 Email from Chad Manuel to Lowell Clark <b>GEO-State 039161-039162</b> <b>Dep. Exhibit 38 Henderson</b>	Stipulated	Disputed	FRE 701, 802, F	
39	5/25/2014 Email from Leonardo Jaramillo to Aaron Rotondo <b>GEO-State 049433-049434</b> <b>Dep. Exhibit 39 Henderson</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
40	5/21/2016 Email from Marc Johnson to Leonardo Jaramillo <b>GEO-State 242931-242932</b> <b>Dep. Exhibit 40 Henderson</b>	Stipulated	Disputed	FRE 403, 701, 802, F	
41	Food Cost Summary from 2015 <b>GEO-State 027771-027803</b> <b>Dep. Exhibit 41 Henderson</b>	Stipulated	Stipulated		
42	Internal (Local) Food Service Supervisor <b>GEO-State 019374-019376</b> <b>Dep. Exhibit 42 Henderson</b>	Stipulated	Stipulated		
43	Food Service Production Supervisor Job Description- April 2007 <b>GEO-State 021123-021124</b> <b>Dep. Exhibit 43 Henderson</b>	Stipulated	Stipulated		
44	Internal/External Job Posting – Food Service Supervisor – March 2015 <b>GEO-State 033048-03049</b> <b>Dep. Exhibit 44 Henderson</b> <b>(Also Dep. Exhibit 300 Delacruz)</b>	Stipulated	Stipulated		

45	GEO OJT for Cook Supervisor <b>GEO-State 023592-023607</b> <b>Dep. Exhibit 45 Henderson</b>	Stipulated	Stipulated		
46	GEO's New Food Service Worker Training Manual. <b>GEO-State 023864-023873</b> <b>Dep. Exhibit 46 Henderson</b>	Stipulated	Stipulated		
47	GEO's New Food Service Clerk Training Manual. 4/27/16 in State v. GEO. <b>GEO-State 023568-023576</b> <b>Dep. Exhibit 47 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
48	Post Orders- Kitchen Officer Swing-2015 <b>GEO-State 016065-016090</b> <b>Dep. Exhibit 48 Henderson</b>	Stipulated	Stipulated		
49	Photograph of Detainee Workers in the Kitchen <b>GEO-State 048485-048490</b> <b>Dep. Exhibit 49 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
50	8/26/2016 Memorandum from Bertha Henderson <b>GEO-State 048543-048550</b> <b>Dep. Exhibit 50 Henderson</b>	Stipulated	Stipulated		
51	5/31/2010 Outcount Sheet Lunch Pay Sheet <b>GEO-State 109476</b> <b>Dep. Exhibit 51 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
52	8/26/2017 Email from Marc Johnson to Bertha Henderson <b>GEO-State 242219-242220</b> <b>Dep. Exhibit 52 Henderson</b>	Stipulated	Stipulated		
53	Email from Nels Riach to Alisha Singleton, et al. Subject: kitchen worker UDC hearings. <b>GEO-State 049409</b> <b>Dep. Exhibit 53 Henderson</b>	Stipulated	Stipulated		
54	NWDC Detainee Work Program Survey 022312.xls <b>GEO-State 048542</b>	Disputed	Disputed	FRE 701, 802, F	

55	5/31/2013 Email from Bertha Henderson to Lowell Clark <b>GEO-State 238991-238992</b> <b>Dep. Exhibit 55 Henderson</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
56	Removed				
57	5/9/2013 Daily Detainee Worker Pay Sheets <b>GEO-State 051384</b> <b>Dep. Exhibit 57 Henderson</b>	Stipulated	Disputed	FRE 403, 701, 802, F	
58	8/19/2010 Email from Bertha Henderson to Leroy Portillo <b>GEO-State 039163-039164</b> <b>Dep. Exhibit 58 Henderson</b>	Stipulated	Stipulated		
59	2/8/2011 Email from Bertha Henderson to Leroy Portillo <b>GEO-State 039171-039172</b> <b>Dep. Exhibit 59 Henderson</b>	Stipulated	Stipulated		
60	12/5/2011 Email from Chad Manuel to Bertha Henderson <b>GEO-State 048893-048894</b> <b>Dep. Exhibit 60 Henderson</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
61	6/8/2009 Email from Kyle Schiller to James Black <b>GEO-State 015831</b> <b>Dep. Exhibit 61 Henderson</b>	Stipulated	Disputed	FRE 701, 802, F	
62	11/25/2014 Email from Lowell Clark to Ryan Kimble <b>GEO-State 036453-036455</b> <b>Dep. Exhibit 62 Henderson</b> <b>Also Dep. Exhibit 193 Kimble</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
63	Request for Staff Adjustment – 1/7/2013 <b>GEO-State 044596-044601</b> <b>Dep. Exhibit 63 Henderson</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
64	Batch Listing – 12/07/2009 <b>GEO-State 104171-104190</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 64 Henderson</b>				
65	Batch Listing - 12/21/2009 <b>GEO-State 104477-104498</b> <b>Dep. Exhibit 65 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
66	Batch Listing – 01/04/2010 <b>GEO-State 104702-104723</b> <b>Dep. Exhibit 66 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
67	Batch Listing – 03/01/2010 <b>GEO-State 106357-106390</b> <b>Dep. Exhibit 67 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
68	Payroll Report – 5/24/2010 <b>GEO-State 109183-109218</b> <b>Dep. Exhibit 68 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
69	06/14/2011 Department Head Meeting Minutes <b>GEO-State 047504-07505</b> <b>Dep. Exhibit 69 Henderson</b>	Stipulated	Stipulated		
70	10/4/2012 Email from Bruce Scott to Carole Curry <b>GEO-State 232270</b> <b>Dep. Exhibit 70 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
71	6/26/2012 Email from John Griffin to Bertha Henderson <b>GEO-State 241374</b> <b>Dep. Exhibit 71 Henderson</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
72	Department Head Meeting Minutes GEO-State 243081-243082 <b>Dep. Exhibit 72 Henderson</b>	Stipulated	Stipulated		
73	4/13/2017 Email from David Tracy to Bertha Henderson <b>GEO-State 027751-027752</b> <b>Dep. Exhibit 73 Henderson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
74	Removed				



75	6/7/2012 Memorandum from Sarjit Singh to Michelle Ziegwied, FSA Henderson <b>GEO-State 021037</b> <b>Dep. Exhibit 75 Henderson</b>	Disputed	Disputed	FRE 402, 403, 701, 802, F	
76	Removed				
77	Removed				
78	5/1/2012 Department Head Meeting Notes <b>GEO-State 029337-029338</b> <b>Dep. Exhibit 78 Singleton</b>	Stipulated	Stipulated		
80	Daily Detainee Worker Pay Sheet – Blank & G-4 Pod Roster for 6/14/17 (Singleton Ex. 80) <b>GEO-State 038177, GEO-State 023021</b> <b>Dep. Exhibit 80 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
81	July 14, 2017 Pod Porters Rosters Pods A-F <b>GEO-State 230007-230021</b> <b>Dep. Exhibit 81 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
82	3/1/2010 Email from Alisha Singleton to Shihpei Stevenson <b>GEO-State 037256-037257</b> <b>Dep. Exhibit 82 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
83	Job Description- Cook/Prep/Server <b>GEO-State 015099</b> <b>Dep. Exhibit 83 Singleton</b>	Stipulated	Stipulated		
84	Job Description- Dishwasher <b>GEO-State 015100</b> <b>Dep. Exhibit 84 Singleton</b>	Stipulated	Stipulated		
85	Job Description – Laundry Worker <b>GEO-State 020107</b> <b>Dep. Exhibit 85 Singleton</b>	Stipulated	Stipulated		
86	4.4.5 GEO NWDC Policy and Procedure Manual – Laundry Services, Effective 4/18/2014 <b>GEO-State 048841-048843</b> <b>Dep. Exhibit 86 Singleton</b>	Stipulated	Stipulated		

87	Laundry Kite from 2017 <b>GEO-State 242843</b> <b>Dep. Exhibit 87 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
88	Job Description – Barber <b>GEO-State 019287</b> <b>Dep. Exhibit 88 Singleton</b>	Stipulated	Stipulated		
89	Job Description – Barber Cleaner <b>GEO-State 019288</b> <b>Dep. Exhibit 89 Singleton</b>	Stipulated	Stipulated		
90	8/15/2006 Memorandum from Jose G. Moncivais Sr. to D/O Riley <b>GEO-State 213729</b> <b>Dep. Exhibit 90 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
91	Job Description – Pod Porter <b>GEO-State 036481-036482</b> <b>Dep. Exhibit 91 Singleton</b>	Stipulated	Stipulated		
92	3/26/2009 Email from Steve Hucke to Alisha Singleton <b>GEO-State 023051-023052</b> <b>Dep. Exhibit 92 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
93	11/5/2012 Email from Alisha Singleton to Bill McHatton <b>GEO-State 019324-019325</b> <b>Dep. Exhibit 93 Singleton (Also Dep. Exhibit 320 Heye)</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
94	09/29/2006 Memorandum from Alisha Singleton to all pod officers <b>GEO-State 036807-036808</b> <b>Dep. Exhibit 94 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
95	6/17/2005 Memorandum from Alisha Singleton to all supervisors & kitchen officers <b>GEO-State 048703</b> <b>Dep. Exhibit 95 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

96	4/14/2005 Memorandum from Alisha Singleton to all kitchen officers <b>GEO-State 048705</b> <b>Dep. Exhibit 96 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
97	02/02/2006 Memorandum from Pierce to Alisha Singleton <b>GEO-State 213595</b> <b>Dep. Exhibit 97 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
98	6/24/2005 Memorandum from Alisha Singleton to all supervisors & kitchen officers <b>GEO-State 048704</b> <b>Dep. Exhibit 98 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
99	1/13/2006 Memorandum from Alisha Singleton to Graveyard Supervisors <b>GEO-State 213599</b> <b>Dep. Exhibit 99 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
100	Volunteer Work Program for Pod Workers (Undated) <b>GEO-Nwauzor 016427 (Same as Exhibit 328)</b>	Stipulated	Stipulated		
101	Job Description - Pod Porters 2009 <b>GEO-State 241568-241569</b> <b>Dep. Exhibit 101 Singleton</b>	Stipulated	Stipulated		
102	Worker Program Classification <b>GEO-State 033225-033226</b> <b>Dep. Exhibit 102 Singleton</b>	Stipulated	Stipulated		
103	Refusal to Work Form <b>GEO-State 241573</b> <b>Dep. Exhibit 103 Singleton</b>	Stipulated	Stipulated		
104	Kitchen Kite 7/9/2010 <b>GEO-State 103716</b> <b>Dep. Exhibit 104 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
105	Detainees Removed from Kitchen per IDP Sanctions <b>GEO-State 231181-231182</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 105 Singleton</b>				
106	2/23/2006 Memorandum from Alisha Singleton to Lt. Robbins <b>GEO-State 213593</b> <b>Dep. Exhibit 106 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
107	2.A Exhibit D Tacoma Revised Pricing Guarantee 072715.xls <b>GEO-State 049255</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
108	8/15/2007 Memorandum C/O Brock to Alisha Singleton <b>GEO-State 214117</b> <b>Dep. Exhibit 108 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
109	Photographs of the medical area in the NWDC <b>WA00030992</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
110	Email from Nels Riach to Alisha Singleton, et al. Subject: UDC for kitchen worker. Singleton Dep. 08/22/17. <b>GEO-State 242218</b> <b>Dep. Exhibit 110 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
111	1/15/2014 Email from Mike Snyder to Alisha Singleton <b>GEO-State 241372-241373</b> <b>Dep. Exhibit 111 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
112	Removed				
113	5/20/2013 Batch Summary <b>GEO-State 120005-120042</b> <b>Dep. Exhibit 113 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
114	10/04/2011 Batch Summary <b>GEO-State 069664-069693</b> <b>Dep. Exhibit 114 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
115	12/07/2009 Batch Summary <b>GEO-State 104147-104170</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 115 Singleton</b>				
116	03/13/2006 Batch Listing <b>GEO-State 207085-207103</b> <b>Dep. Exhibit 116 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
117	06/08/2010 Batch Listing <b>GEO-State 109685-109723</b> <b>Dep. Exhibit 117 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
118	3/25/2005 Detainee Kite <b>GEO-State 208882</b> <b>Dep. Exhibit 118 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
119	Laundry Photograph <b>WA00030823</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
120	4/29/2010 Email from Alisha Singleton to Leroy Portillo <b>GEO-State 022193</b> <b>Dep. Exhibit 120 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
121	7/19/2011 Memorandum from E. Smith to all concerned <b>GEO-State 036819</b> <b>Dep. Exhibit 121 Singleton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
123	NWDC Detainee Handbook – 8/1/16 <b>GEO-State 011328-011365</b> <b>Dep. Exhibit 123 Singleton</b>	Stipulated	Stipulated		
124	Tacoma Pricing 1575 040609 (Revised).xls <b>GEO-State 022284</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
125	Removed				
126	Removed				
127	Complete Copy of 2011 PBNDS, as revised <b>GEO-Nwauzor 184813-185267</b>	Stipulated	Stipulated		
128	GEO NWDC Policy and Procedure Manual: Detainee Classification, Effective: 4/13/2015 <b>GEO-State 044801-044810</b> <b>Dep. Exhibit 128 Singleton</b>	Stipulated	Stipulated		

129	2015 contract between Immigration and Customs Enforcement (ICE) and GEO, No. HSCEDM-15-D-00015 in effect September 28, 2015 <b>GEO-State 036825-037027</b> <b>And GEO-Nwauzor 085023-05225</b> <b>Dep. Exhibit 129 McHatton</b>	Stipulated	Disputed	C	
130	NWDC Chronological Routine Events <b>GEO-State 028802-028803</b> <b>Dep. Exhibit 130 McHatton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
131	Welcome Book ACA Audit – September 25-27, 2017 <b>GEO-State 242548-242624</b> <b>Dep. Exhibit 131 McHatton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
132	September 1, 2015 Department Head Meeting Minutes <b>GEO-State 014578-014579</b> <b>Dep. Exhibit 132 McHatton</b>	Stipulated	Stipulated		
133	NWDC Detainee Laundry Training <b>GEO-State 003525</b> <b>Dep. Exhibit 133 McHatton</b>	Stipulated	Stipulated		
134	Division of Immigration Health Services CDF Tacoma- Detainee Record Cleaning <b>GEO-State 003528</b> <b>Dep. Exhibit 134 McHatton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
135	Annual OSHA Inspection Barber Shop <b>GEO-State 037347</b> <b>Dep. Exhibit 135 McHatton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
136	Removed				
137	GEO NWDC Policy and Procedure Manual 3.3.1: Infractions and Disciplinary Sanctions	Stipulated	Stipulated		

	<b>GEO-State 016389-016407</b> <b>Dep. Exhibit 137 McHatton</b> <b>(Also Dep. Exhibit 352 Scott)</b>				
138	J. Black to C. Nelson and others with Detainee letter re: hunger strike. 03/08/14 <b>GEO-Nwauzor 096527-096530</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
139	Post Order: Barber Shop, Effective Date: 10/10/2017 <b>GEO-State 027416-027438</b> <b>Dep. Exhibit 139 McHatton</b>	Stipulated	Stipulated		
140	Post Order: Housing Unit Officer, Effective Date: 4/5/2016 <b>GEO-State 027439-02746</b> <b>Dep. Exhibit 140 McHatton</b>	Stipulated	Stipulated		
141	Post Order: Laundry Officer, Effective Date: 4/5/2016 <b>GEO-State 028704-028726</b> <b>Dep. Exhibit 141 McHatton</b>	Stipulated	Stipulated		
142	Post Order: Kitchen Officer Swing, Effective Date: 04/13/2015 <b>GEO-State 016065-016090</b> <b>Dep. Exhibit 142 McHatton</b>	Stipulated	Stipulated		
143	House Unit Photograph <b>WA00030674</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
144	Technical and Management Capability: Management and Technical Capabilities Plan, August 25, 2015 <b>GEO-State 040960-041033</b> <b>Dep. Exhibit 144 McHatton</b>	Stipulated	Stipulated		
145	Removed				
146	8/24/2011 Memorandum from Heather West to Mike Ruckstuhl <b>GEO-State 020014</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 146 McHatton</b>				
147	GEO NWDC Policy and Procedure Manual--2.1.4: Environmental Health Independent Audits, Effective <b>GEO-State 041454-041477</b> <b>Dep. Exhibit 147 McHatton</b>	Stipulated	Stipulated		
148	3/1/2016 Memorandum from Lowell Clark to Ryan Kimble, Bill McHatton, Lee Jaramillo <b>GEO-State 033147-033148</b> <b>Dep. Exhibit 148 McHatton</b>	Stipulated	Stipulated		
149	GEO NWDC Policy and Procedure Manual—4.4.1: Housekeeping Services, Effective 4/18/2014 <b>GEO-State 047869-047873</b> <b>Dep. Exhibit 149 McHatton</b>	Stipulated	Stipulated		
150	Visiting Room Photograph <b>WA00029864</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
151	Removed				
152	Tacoma Fire Inspection Report <b>GEO-State 232433-232434</b> <b>Dep. Exhibit 152 McHatton</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
153	Removed				
154	Removed				
155	Standards Compliance Checklist – Fire Safety <b>GEO-State 040055-040064</b> <b>Dep. Exhibit 155 Scott</b>	Stipulated	Stipulated		
156	Weekly Sanitation Inspection – 2/14/2011 <b>GEO-State 016389-016407</b> <b>Dep. Exhibit 156 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
157	NWDC Officer Unit Report <b>GEO-State 270055-270111</b> <b>Dep. Exhibit 157 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
158	Removed				
159	Removed				
160	11/15/2011 Email from Heather West to Bruce Scott	Stipulated	Disputed	FRE 402,	



	<b>GEO-State 020106</b> <b>Dep. Exhibit 160 Scott</b>			701, 802, F	
161	Removed				
162	11/29/2011 Department Head Meeting Notes <b>GEO-State 014575-014577</b> <b>Dep. Exhibit 162 Scott</b>	Stipulated	Stipulated		
163	NWDC Organizational Chart revised 7/1/2014 <b>GEO-State 249465</b> <b>Dep. Exhibit 163 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
164	2016 National Detainee Handbook <b>GEO-State 003481-003508</b>	Stipulated	Stipulated		
165	Removed				
166	Excel Sheet (PDF)– Compliance 2015-2017 <b>GEO-State 028807</b> <b>Dep. Exhibit 166 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
167	Removed				
168	3/6/2013 Facility Jobs Available <b>GEO-State 252347</b> <b>Dep. Exhibit 168 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
169	3/2/2017 Email from Bruce Scott to Ryan Kimble <b>GEO-State 049435-049465</b> <b>Dep. Exhibit 169 Scott</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
170	9/30/2017 Email from Mike Snyder to Bruce Scott <b>GEO-State 052346</b> <b>Dep. Exhibit 170 Scott</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
171	1/2/2013 Law Library Sign-up Sheet <b>GEO-State 252634-252636</b> <b>Dep. Exhibit 171 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
172	1/2/2012 Law Library Schedule <b>GEO-State 252412</b> <b>Dep. Exhibit 172 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
173	January 2013 Barbershop Schedule <b>GEO-State 252417-252420</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 173 Scott</b>				
174	Removed				
175	1/2/2017 Batch Summary <b>GEO-State 227051-227091</b> <b>Dep. Exhibit 175 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
176	1/5/2014 December Worker Pay Memo <b>GEO-State 047699</b> <b>Dep. Exhibit 176 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

177	5/2/2016 April 1-30, 2016 Worker Pay Memo <b>GEO-State 047661</b> <b>Dep. Exhibit 177 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
178	2/1/2017 January 1-31, 2017 Worker Pay Memo <b>GEO-State 047694</b> <b>Dep. Exhibit 178 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
179	Invoice to ICE August 2008 <b>GEO-State 038905-38907</b> <b>Dep. Exhibit 179 Kimble</b>	Stipulated	Disputed	C	
180	Invoice to ICE November 2016 <b>GEO-State 250787-250788, GEO-State 047133-147134</b> <b>Dep. Exhibit 180 Kimble</b>	Disputed	Disputed	C	
181	Invoice to ICE for January 2018 <b>GEO-State 045343-045354</b> <b>Dep. Exhibit 181 Kimble</b>	Stipulated	Disputed	C	
182	6/3/2015 Letter from Amber Martin to James Dana Adams <b>GEO-State 249284</b> <b>Dep. Exhibit 182 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
183	12/19/2014, No. HSCEDM-15-R-00001, GEO Cost/Price Proposal <b>GEO-State 048155-048161</b>	Stipulated	Disputed	C	

	<b>Dep. Exhibit 183 Kimble</b>				
184	8/25/2015 Email from Matt DenAdel to Amber Martin with attached Final GEO Ex. D Tacoma 1101 Bed Guarantee 082575.xls pricing workbook <b>GEO-State 248404-248406</b> <b>Dep. Exhibit 184 Kimble</b>	Stipulated	Disputed	C	
185	Batch Summary 2/28/2014 for work on 2/27/2014 <b>GEO-State 139888-139924</b>	Stipulated	Disputed	FRE 701, 802, F	
186	4/4/2014 Email from Ryan Kimble to Amanda Valencia with attached Q1 2014 actual to Budget spreadsheet <b>GEO-State 035580-035582</b> <b>Dep. Exhibit 186 Kimble</b>	Stipulated	Disputed	C	
187	NWDC Facility Variance Report March 2014 <b>GEO-State 033144</b> <b>Dep. Exhibit 187 Kimble</b>	Stipulated	Disputed	C	
188	10/30/2017 Letter from Ryan Kimble to Roberta Hall <b>GEO-State 046233-046235</b> <b>Dep. Exhibit 188 Kimble</b>	Stipulated	Disputed	C	
189	12/6/2013 Email from Lowell Clark to Ryan Kimble <b>GEO-State 227765</b> <b>Dep. Exhibit 189 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
190	4/18/2016 Email from James Grant to Adrian Sandoval et al. <b>GEO-State 258097-258105</b> <b>Dep. Exhibit 190 Kimble</b>	Disputed	Disputed	FRE 402, 701, 802, F	
191	Photographs of the visitation area in the NWDC <b>WA00029857</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
192	Photographs of the visitation area in the NWDC <b>WA00029869</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

193	11/25/2014 Email from Lowell Clark to Ryan Kimble with Staffing Plan for 1303 Detainees Spreadsheet (color) <b>GEO-State 036453-036456</b> <b>Dep. Exhibit 193 Kimble (Dep. Exhibit is missing page 036454)</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
194	2014 Budget Western Region Overview – Slideshow <b>GEO-State 227808-227859</b> <b>Dep. Exhibit 194 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

195	Facility Variance Report Q1 2014 v. Q1 2013 <b>GEO-State 035583</b> <b>Dep. Exhibit 195 Kimble</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
196	GEO NWDC Policy 5.1.2, supersedes 4/13/2009 Contract – Governing the Voluntary Work program <b>GEO-State 005798-005805</b>	Stipulated	Stipulated		
197	GEO NWDC Policy 5.1.2, effective 4/18/14 <b>GEO-State 003460-003467</b>	Stipulated	Stipulated		
198	Solicitation, Offer, and Award for ICE Contract <b>GEO-State 040430-040660</b> <b>Dep. Exhibit 198 Bingham</b>	Stipulated	Disputed	C	
199	Removed				
200	2008 National Detainee Handbook <b>GEO-State 015696-015723</b>	Stipulated	Stipulated		
201	NWDC Detainee Handbook, Revised 1/17/2017 <b>GEO-State 253723-253748</b>	Stipulated	Stipulated		
202	Award for GEO/ICE Contract 2009 <b>GEO-State 270461-270648</b> <b>Dep. Exhibit 202 Bingham</b>	Stipulated	Disputed	C	
203	July 26, 2002 Correctional Services Corporation Contract <b>GEO-State 00270649-00270784</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 203 Bingham</b>				
204	NWDC Detainee Handbook, Signed 4/09/2015 <b>GEO-State 006053-006090</b>	Stipulated	Stipulated		
205	Declaration of Tae Johnson <b>ECF No. 91</b> <b>Dep. Exhibit 205 Bingham</b>	Stipulated	Stipulated		
209	Register of Wage Determinations <b>Dep. Exhibit 209 Nickerson</b>	Disputed	Disputed	FRE 402, 701, 702, 802, F	
210	Facility Jobs Available, 5/10/13 <b>GEO-State 252601</b> <b>Dep. Exhibit 210 Nickerson</b>	Stipulated	Disputed	FRE 402, 701, 702, 802, F	
211	Offender Job Program Assignments <b>GEO State 000931</b>	Stipulated	Disputed	FRE 402, 701, 702, 802, F	
212	Barbershop Photograph <b>WA00029833</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
213	Removed				
214	Removed				
215	Removed				
216	Barbershop Photograph <b>WA00029783</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
217	Law Library Photograph <b>WA00029742</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
218	Grey Mile Photograph <b>WA00029760</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
219	Barbershop Photograph <b>WA00029788</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
220	Removed				
221	Removed				
222	Removed				
223	Barbershop Photograph <b>WA00029843</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

224	Post Orders – Laundry Officer <b>GEO-State 044392-044414</b> <b>Dep. Exhibit 224 Menza</b>	Stipulated	Stipulated		
225	GEO OJT for new Laundry Supervisors <b>GEO-State 023610-023616</b> <b>Dep. Exhibit 225 Menza</b>	Stipulated	Stipulated		
226	8/24/2011 Memorandum from Heather West to Mike Ruckstuhl <b>GEO-State 020012</b> <b>Dep. Exhibit 226 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
227	5/15/2017 Email from Michael Heye to Marc Johnson <b>GEO-State 242922-242924</b> <b>Dep. Exhibit 227 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
228	Blank Daily Detainee Worker Pay Sheet <b>GEO-State 033236</b> <b>Dep. Exhibit 228 Menza</b>	Stipulated	Stipulated		
229	VWP Agreement <b>GEO-State 015834</b> <b>Dep. Exhibit 229 Menza</b>	Stipulated	Stipulated		
230	VWP 92833– Spanish <b>GEO-State 015835</b> <b>Dep. Exhibit 230 Menza</b>	Stipulated	Stipulated		
231	Laundry Detail – List of Laundry Workers <b>GEO-State 241705-241706</b> <b>Dep. Exhibit 231 Menza</b>	Stipulated	Disputed	FRE 701, 802, F	
232	Daily Work Crew County Sheet <b>GEO-State 233578-233581</b> <b>Dep. Exhibit 232 Menza</b>	Stipulated	Disputed	FRE 701, 802, F	
233	Photograph of hallway outside of laundry with detainee and 3 GEO employees	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>WA00030811</b> <b>Dep. Exhibit 233 Menza</b>				
234	Photograph of bins with laundry in the hallway outside of the laundry <b>WA00030821</b> <b>Dep. Exhibit 234 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
235	Photograph of washing machines <b>WA00030830</b> <b>Dep. Exhibit 235 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
236	Removed				
237	Photograph of narrow hallway with ducts and machinery in laundry <b>WA00030845</b> <b>Dep. Exhibit 237 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
238	Photograph of dryers and washers with bins of laundry in the middle <b>WA00030854</b> <b>Dep. Exhibit 238 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
239	Photograph of closet in laundry with shelving of white cloth and shoes <b>WA00030876</b> <b>Dep. Exhibit 239 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
240	Removed				
241	Photographs of shelves with multi-colored detainee uniforms in laundry <b>WA00030880</b> <b>Dep. Exhibit 241 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
242	Removed				
243	Removed				
244	Photograph of laundry with detainee emptying drier <b>WA00030891</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 244 Menza</b>				
245	Photograph of charts with “DONE” written in marker – D-3-Unit and Medical 2 <b>WA00030940</b> <b>Dep. Exhibit 245 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
246	Close-up photograph of drier warning label and control panel <b>WA000309916</b> <b>Dep. Exhibit 246 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
247	Removed				
248	Removed				
249	Removed				
250	Photograph of office in laundry <b>WA00030891</b> <b>Dep. Exhibit 250 Menza</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

251	Photographs of the law library in the NWDC <b>WA00029726</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
252	Consolidated Financial Statement for 2005 through 2018 for Northwest Detention Center <b>Dep. Exhibit 252 Hill</b>	Stipulated	Disputed	FRE 701, 802, F	
253	Consolidated Financial Statement for 2005 through 2018 for Northwest Detention Center with writing <b>Dep. Exhibit 253 Hill</b>	Stipulated	Disputed	FRE 701, 802, F	
254	2015 ICE Fiscal Year Contract Billing Accumulation per CLIN with attachments <b>GEO-State 046790-046803</b> <b>Dep. Exhibit 254 Hill</b>	Stipulated	Disputed	FRE 701, 802, F	
255	December 7, 2009 Revised Pricing – Contract No. HSCDEM-10-D-00001 <b>GEO-State 251859-251862</b> <b>Dep. Exhibit 255 Hill</b>	Stipulated	Disputed	FRE 401/402, 701, 802, F	



256	November 19, 2009 Letter from GEO to DHS Contracting Officer re Contract <b>GEO-State 251819-251822</b> <b>Dep. Exhibit 256 Hill</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
257	4/14/2009 Email from Shihpei Stevenson to George Wigen with attached NWDC 1000 beds expanded to 1575 bed pricing spreadsheet 040609 (Revised) <b>GEO-State 022282-022293</b> <b>(022294 was withheld as non-responsive)</b> <b>Dep. Exhibit 257 Hill</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
258	12/8/2009 Email from Eric Smith to George Wigen with attached NWDC 1000 beds expanded to 1575 beds alternative pricing spreadsheet 112509 <b>GEO-State 022245-022246</b> <b>Dep. Exhibit 258 Hill</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

259	5/2/2017 Email from Chuck Hill to Ryan Kimble <b>GEO-State 250974-250975</b> <b>Dep. Exhibit 259 Hill</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
260	9/2/2015 Email from Ryan Kimble to Chuck Hill <b>GEO-State 027910-02791</b> <b>Dep. Exhibit 260 Hill</b>	Stipulated	Disputed	FRE 701, 802, F	
261	Northwest ICE Processing Center Facility Budget Summaries <b>GEO-State 299184, GEO-State 299195 (color .xls)</b>	Stipulated	Disputed	FRE 701, 802, F	
262	Northwest ICE Processing Center Facility Financial Summaries <b>GEO-State 299185, GEO-State 299196 (color .xls)</b>	Stipulated	Disputed	FRE 701, 802, F	
263	GEO NWDC 1575 Bed Per Diem Calculation <b>GEO-State 299191-299192</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
264	GEO NWDC 1000 Beds Expanded to 1575 Bed Per Diem Calculation	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>GEO-State 299193</b>				
265	GEO NWDC Total Staffing Plan (1575 Beds) <b>GEO-State 299186-299187</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
266	GEO NWDC Exhibit A Staffing Plan (1575 Detainees) <b>GEO-State 299188-299190</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
267	NWDC Pricing Spreadsheets <b>GEO-State 022248</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
268	GEO Budget Excel Spreadsheet (March 2013 Budget to Actual Facility Variance Report) <b>GEO-State 035584</b>	Stipulated	Disputed	FRE 701, 802, F	
269	GEO NWDC Detainee Work Reimbursement from ICE <b>GEO-State 299194</b>	Stipulated	Disputed	FRE 701, 802, F	
270	2005 NWDC Year End Report.doc <b>GEO-State 029290-029309</b>	Stipulated	Disputed	FRE 701, 802, F	
271	2006 NWDC Year End Report.doc <b>GEO-State 029676-029697</b>	Stipulated	Disputed	FRE 701, 802, F	
272	2008 NWDC Year End Report.doc <b>GEO-State 029741-029764</b>	Stipulated	Disputed	FRE 701, 802, F	
273	2013 NWDC Year End Report <b>GEO-State 050215-050241</b>	Stipulated	Stipulated	FRE 701, 802, F	
274	Work Crew Count Tally January 2007 <b>GEO-State 048413</b>	Stipulated	Disputed	FRE 701, 802, F	
275	Work Crew.xls <b>GEO-State 048409</b>	Stipulated	Disputed	FRE 701, 802, F	
276	Work Crew Count.xls <b>GEO-State 048411</b>	Stipulated	Disputed	FRE 701, 802, F	
277	App. D-Work Crew.xls <b>GEO-State 048412</b>	Stipulated	Disputed	FRE 701, 802, F	
278	GEO Group, Inc. Annual Report 2003 <b>WA00003818-00003893</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	

279	GEO Group, Inc. Annual Report 2004 <b>WA00003894-00003945</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
280	GEO Group, Inc. Annual Report 2005 <b>WA00003946-00003995</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
281	GEO Group, Inc. Annual Report 2006 <b>WA00003996-00004063</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
282	GEO Group, Inc. Annual Report 2007 <b>WA00004064-00004133</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
283	GEO Group, Inc. Annual Report 2008 <b>WA00004134-00004190</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
284	GEO Group, Inc. Annual Report 2009 <b>WA00004191-00004297</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
285	GEO Group, Inc. Annual Report 2010 <b>WA00004298-00004417</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
286	GEO Group, Inc. Annual Report 2011 <b>WA00004418-00004539</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
287	GEO Group, Inc. Annual Report 2012 <b>WA00004540-00004661</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
288	GEO Group, Inc. Annual Report 2013 <b>WA00004662-00004806</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
289	GEO Group, Inc. Annual Report 2014 <b>WA00004807-00004944</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	

290	GEO Group, Inc. Annual Report 2015 <b>WA00004945-00005083</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
291	GEO Group, Inc. Annual Report 2016 <b>WA00005084-00005242</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
292	GEO Group, Inc. Annual Report 2017 <b>WA00005243-00005398</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
293	GEO Group, Inc. Annual Report 2018 <a href="http://www.snl.com/interactive/newlookandfeel/4144107/GEOGroup2018AR.pdf">http://www.snl.com/interactive/newlookandfeel/4144107/GEOGroup2018AR.pdf</a> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
294	First Quarter 2018 Supplemental Information <b>WA00003620-00003643</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 701, 802, F	
295	The GEO Group Signs Contract for the Continued Management of the Northwest Detention Center [Press Release] <a href="https://www.businesswire.com/news/home/20151001005937/en/">https://www.businesswire.com/news/home/20151001005937/en/</a>	Disputed	Disputed	FRE 402, 403, 602, 701, 802, F	
296	Personnel Action Forms dated 10/27/2017 & 10/27/2010 <b>GEO State 239955-239957</b>	Stipulated	Disputed	FRE 402, 403, 602, 701, 802, F	
297	House Unit Photograph <b>WA00030778</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
298	House Unit Photograph <b>WA00030794</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
299	House Unit Photograph <b>WA00030396</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
300	Internal/External Job Posting – Food Service Supervisor NWDC <b>GEO-Nwauzor 054190-054191</b>	Stipulated	Stipulated		

	<b>Dep. Exhibit 300 Delacruz</b>				
301	OJT for Food Service Manager <b>GEO-Nwauzor 026284-026292</b> <b>Dep. Exhibit 301 Delacruz</b>	Stipulated	Stipulated		
302	Photographs of the law library in the NWDC <b>WA00029747</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
303	Food Service Department - Food Cost Summary <b>GEO-Nwauzor 040015</b> <b>Dep. Exhibit 303 Delacruz</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
304	Job Descriptions: Cook, Dishwasher, Food Prep, Light Duty, Line Back-up, Lineserver, Pots and Pans, Storeroom Puller, Utility <b>Dep. Exhibit 304 Delacruz</b>	Stipulated	Stipulated		
305	Kitchen Worker Orientation Checklist <b>GEO-Nwauzor 004619-004629</b> <b>Dep. Exhibit 305 Delacruz</b>	Stipulated	Stipulated		
306	Detainee/Staff Health and Hygiene <b>GEO-Nwauzor 177020-177022</b> <b>Dep. Exhibit 306 Delacruz</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
307	Removed				
308	6/25/2017 Daily Detainee Worker Pay Sheet-Pod G1, G4 <b>GEO-Nwauzor 0065428-065429</b> <b>Dep. Exhibit 308 Delacruz</b>	Stipulated	Disputed	FRE 701, 802, F	
309	10/22/2015 Pod Porters Roster <b>GEO-Nwauzor 026921-026953</b> <b>Dep. Exhibit 309 Delacruz</b>	Stipulated	Disputed	FRE 701, 802, F	
310	Removed				
311	Job Description - Sergeant <b>GEO-Nwauzor 000340-000341</b> <b>Dep. Exhibit 311 Tracy</b>	Stipulated	Stipulated	FRE 402, 609, 701, 802, F	
312	NWDC - Organizational Chart <b>GEO-Nwauzor 044059-044067</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>Dep. Exhibit 312 Tracy</b>				
313	Rosters of Facility Job Assignments - 2013 <b>GEO-State 252601, 252974, 252910</b>	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
314	Memo re: QCP Reports for VWP from B. Scott to S. Delony 11/15/13 <b>GEO-Nwauzor 005902</b>	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
315	Detainee Job Descriptions: Barber, Barbershop, Medical Cleaning, General Worker, Laundry Worker <b>Dep. Exhibit 315 Tracy</b>	Stipulated	Stipulated		
316	Detainee Pod Porter Job Descriptions <b>GEO-Nwauzor 078053-078054</b> <b>Dep. Exhibit 316 Tracy</b>	Stipulated	Stipulated		
317	House Unit Photograph <b>WA00030399</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
318	Email from Marc Johnson to Bertha Henderson re: 3 thefts from the kitchen 09/14/11 <b>GEO-Nwauzor 001605</b> <b>Dep. Exhibit 318 Johnson</b>	Stipulated	Disputed	FRE 402, 403 609, 701, 802, F	
319	Erwin Delacruz Employee Training Sheet <b>GEO-Nwauzor 085280-085281</b> <b>Dep. Exhibit 319 Heye</b>	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
320	Memo re: QCP Reports for VWP from B. Scott to S. Delony 11/15/13 <b>GEO-Nwauzor 005902</b>	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
321	5/30/14 Detainee Kite requesting to work <b>GEO-Nwauzor 141925-141926</b> <b>Dep. Exhibit 321 Heye</b>	Stipulated	Stipulated		
322	Work Crew.xls <b>GEO-State 048410</b>	Stipulated	Disputed	FRE 701, 802, F	

323	12/26/12 Email from Van Ngonephasouk to Michael Heye <b>GEO-Nwauzor 097538</b> <b>Dep. Exhibit 323 Heye</b>	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
324	3/30/16 Department Head Meeting Minutes <b>GEO-Nwauzor 181325-181326</b> <b>Dep. Exhibit 324 Heye</b>	Stipulated	Stipulated		
325	Slip Sheet RE: Excel spreadsheet entitled "Detainee Worker Average Hours" and Excel spreadsheet <b>Dep. Exhibit 325 Heye (Also Dep. Exhibit 20)</b>	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
326	Presentation Outline, Lesson Title: Detainee Worker Program prepared by Alisha Singleton 12/29/11 <b>GEO-Nwauzor 016346-016350</b> <b>Dep. Exhibit 326 Heye</b>	Stipulated	Stipulated		
327	Worker Program <b>GEO-Nwauzor 058848</b> <b>Dep. Exhibit 327 Heye</b>	Stipulated	Stipulated		
328	Volunteer Work Program for Pods <b>GEO-Nwauzor 016427</b> <b>Dep. Exhibit 328 Heye</b>	Stipulated	Stipulated		
329	House Unit Photograph <b>WA00030403</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
330	Removed				
331	Removed				
332	Geo Group Trust Account 214 - Worker Pay Reimbursement 9/2015 with Payroll Transactions for 9/1/2015 – 10/2/2015 (partial) <b>GEO-Nwauzor 073752-073761</b> <b>Dep. Exhibit 332 Heye</b>	Stipulated	Disputed	FRE 701, 802, F	
333	Declaration of former detainee Orlando Zavalza Marquez in Spanish <b>WA00003543-00003546</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	

334	Certified translation of the declaration of Orlando Zavalza Marquez in English. <b>WA00006973-00006977</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
335	Declaration of former detainee Manuel Riveron Pina in Spanish <b>WA00005399-00005402</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
336	Certified translation of the declaration of Manuel Riveron Pina in English <b>WA00007582-00007586</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
337	Declaration of former detainee Jesus Lopez Paez in Spanish <b>WA00007590-00007595</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
338	Certified translation of declaration of Jesus Lopez Paez in English <b>WA00008066-00008072</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
339	Declaration of former detainee Judith Chavez Ortiz in Spanish <b>WA00007587-00007589</b>	Stipulated	Disputed	FRE 403, 701, 702, 802 F	
340	Certified translation of declaration of Judith Chavez Ortiz in English <b>WA00008073-00008076</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
341	Declaration of former detainee Karla Gomez Soto in Spanish <b>WA00029708-00029710</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
342	Certified translation of declaration of Karla Gomez Soto in English <b>WA00029711-00029714</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
343	Declaration of former detainee Noe Baltazar Noe in Spanish <b>WA00029699-00029702</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	



344	Certified Translation of declaration of Noe Baltazar Noe in English <b>WA00029703-00029707</b>	Stipulated	Disputed	FRE 403, 701, 702, 802, F	
345	Removed				
346	2014 Welcome Book ACA Re-Accreditation Audit <b>GEO-Nwauzor 022874-022940</b> <b>Dep. Exhibit 346 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
347	Commission on Accreditation for Corrections Standards Compliance Reaccreditations Audit <b>GEO-Nwauzor 028201-028239</b> <b>Dep. Exhibit 347 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
348	2017 Welcome Book ACA Audit <b>GEO-Nwauzor 044051-044127</b> <b>Dep. Exhibit 348 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
349	2017 Commission on Accreditation for Corrections Standards Compliance Reaccreditations Audit <b>GEO-Nwauzor 026329-026373</b> <b>Dep. Exhibit 349 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
350	Letter dated January 20, 2017, from Bruce Scott to American Corrections Association <b>GEO-Nwauzor 096706-096719</b> <b>Dep. Exhibit 350 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

351	Email from Heye to Scott dated 2/13/13 <b>GEO-Nwauzor 003715-003721</b> <b>Dep. Exhibit 351 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
352	Kitchen Photograph <b>WA00030166</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
353	Kitchen Photograph <b>WA00030075</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
354	GEO's FRCP 26(a)(1) Initial Disclosures 12/27/17 <b>Dep. Exhibit 354 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

	<b>NWAUZOR ONLY/Phase 2 only</b>				
355	Annual NWDC Expense Spreadsheets <b>GEO-Nwauzor 084666</b> <b>Dep. Exhibit 355 Scott</b> <b>NWAUZOR ONLY/Phase 2 only</b>	Stipulated	Disputed	FRE 701, 802, F	
356	2015 ICE-GEO Contract <b>GEO-Nwauzor 096300-096502</b> <b>Dep. Exhibit 356 Scott</b> <b>(Also Dep. Exhibit 129)</b>	Stipulated	Disputed	C	
357	GEO's Responses to Nwauzor Plaintiffs First Interrogatories and Requests for Production <b>Dep. Exhibit 357 Scott</b> <b>NWAUZOR ONLY/Phase 2 only</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
358	Invoice to ICE January 2017 – February 2018 <b>GEO-State 045059-047718</b> <b>Dep. Exhibit 358 Scott</b>	Stipulated	Disputed	FRE 701, 802, F	
359	Article entitled "Tacoma immigration detention center is misunderstood" by James Black. TacomaNewsTribune-4/15/17-Opinion Page	Stipulated	Disputed	FRE 402, 701, 609, 802, F	
360	NWDC Facility Financial Summaries Spreadsheet <b>GEO-Nwauzor 198805</b> <b>Dep. Exhibit 360 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
361	PNBDS 2011 Section 5.8 <b>GEO-Nwauzor 018711-019099</b> <b>Dep. Exhibit 361 Scott</b> <b>(Also Dep. Exhibit 17 30(b)(6) Kimble)</b>	Stipulated	Stipulated	FRE 402, 701, 802, F	
362	4/18/2006 and 4/7/2006 Batch Listings (partial) <b>GEO-Nwauzor 293934; 293672</b> <b>Dep. Exhibit 362 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

363	4/12/2012 Memorandum from Classification to Associate Warden McHatton re: VWP 2011 PBNDS Standards <b>GEO-Nwauzor 016445</b> <b>Dep. Exhibit 363 Scott</b> <b>(Also Dep. Exhibit 14)</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
364	8/30/2014 Email to Bill McHatton to Lowell Clark <b>GEO-State 283813-14</b> <b>Dep. Exhibit 364 Scott</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
365	May 30, 2018 Letter from GEO CEO to Peter Edge 2018-ICLI-00052-3404 <b>Dep. Exhibit 365 Scott</b>	Stipulated	Disputed	FRE 402, 403, 701, 802, MIL, F	
365 A	May 30, 2018 Letter from GEO CEO to Peter Edge 2018-ICLI-00052-3404 <b>UNREDACTED</b> <b>GEO-State 299197</b>	Stipulated	Disputed	FRE 402, FRE 403, 802, MIL, F	
366	GEO Group Job Description – Job Title: Janitor. 04/2007 <b>GEO-Nwauzor 010202</b>	Stipulated	Stipulated	FRE 402, 701, 802, F	
367	GEO Group Job Description – Job Title: Food Service, Detention Officer. 04/2007 <b>GEO-Nwauzor 014245-014246</b>	Stipulated	Stipulated	FRE 402, 701, 802, F	
368	GEO Group Job Description – Job Title: Maintenance Technician. 04/2007 <b>GEO-Nwauzor 014243-014244</b>	Stipulated	Stipulated	FRE 402, 701, 802, F	
369	Worker Pay Reimbursement Request for work performed in July 2017, signed by Ryan Kimble 08/01/17 <b>GEO-Nwauzor 072107-072290</b> <b>Dep. Exhibit 369 Munson</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
370	Invoice to ICE for December 2009 <b>GEO-State 039320-039321</b>	Stipulated	Disputed	FRE 701, 802, F	

371	Invoice to ICE for December 2010 <b>GEO-State 229228-229235</b>	Stipulated	Disputed	FRE 701, 802, F	
372	Invoice to ICE for January 2011 <b>GEO-State 229212-229222</b>	Stipulated	Disputed	FRE 701, 802, F	
373	Invoice to ICE March 2011 <b>GEO-State 297762-297770</b>	Stipulated	Disputed	FRE 701, 802, F	
374	Invoice to ICE for December 2011 <b>GEO-State 038133</b>	Stipulated	Disputed	FRE 701, 802, F	
375	Invoice to ICE for December 2012 <b>GEO-State 038143</b>	Stipulated	Disputed	FRE 701, 802, F	
376	Invoice to ICE for December 2013 <b>GEO-State 045929-045930</b>	Stipulated	Disputed	FRE 701, 802, F	
377	Invoice to ICE for December 2014 <b>GEO-State 045177</b>	Stipulated	Disputed	FRE 701, 802, F	
378	Invoice to ICE for December 2015 <b>GEO-State 044891, 044893</b>	Stipulated	Disputed	FRE 701, 802, F	
379	Invoice to ICE January 2016 <b>GEO-State 044956-044957</b>	Stipulated	Disputed	FRE 701, 802, F	
380	Invoice to ICE February 2016 <b>GEO-State 044955</b>	Stipulated	Disputed	FRE 701, 802, F	
381	Invoice to ICE March 2016 <b>GEO-State 041334, GEO-State 044968</b>	Stipulated	Disputed	FRE 701, 802, F	
382	Invoice to ICE April 2016 <b>GEO-State 044944-044945</b>	Stipulated	Disputed	FRE 701, 802, F	
383	Invoice to ICE May 2016 <b>GEO-State 044853, GEO-State 044972</b>	Stipulated	Disputed	FRE 701, 802, F	
384	Invoice to ICE June 2016 <b>GEO-State 046993</b>	Stipulated	Disputed	FRE 701, 802, F	
385	Invoice to ICE August 2016 <b>GEO-State 044948-044949</b>	Stipulated	Disputed	FRE,7 01, 802, F	
386	Invoice External September 1-27, 2016 <b>GEO-State 250783</b>	Stipulated	Disputed	FRE 701, 802, F	

387	Invoice to ICE September 28-30, 2016 <b>GEO-State 250784</b>	Stipulated	Disputed	FRE 701, 802, F	
388	Invoice to ICE October 2016 <b>GEO-State 044980</b>	Stipulated	Disputed	FRE 701, 802, F	
389	Invoice to ICE November 2016 <b>GEO-State 044975-044976</b>	Stipulated	Disputed	FRE 701, 802, F	
390	Invoice External December 2016 <b>GEO-State 044952-044953</b>	Stipulated	Disputed	FRE 701, 802, F	
391	Invoice to ICE July 2017 <b>GEO-State 045064-045074</b>	Stipulated	Disputed	FRE 701, 802, F	
392	Invoice to ICE for December 2017 <b>GEO-State 045252-045264</b>	Stipulated	Disputed	FRE 701, 802, F	
393	Batch Summaries Daily Detainee Worker Pay Sheets for 7/6/2006 and 7/31/2006 <b>GEO-State 204257, 122690</b>	Stipulated	Disputed	FRE 701, 802, F	
394	Batch Summary 12/7/2007 for work 12/6/2007 <b>GEO-State 214873-214898</b>	Stipulated	Disputed	FRE 701, 802, F	
395	Batch Summary 12/21/2007 for work 12/20/2007 <b>GEO-State 214446-214473</b>	Stipulated	Disputed	FRE 701, 802, F	
396	Batch Summary 12/3/2008 for work 12/3/2008 <b>GEO-State 220980-221006</b>	Stipulated	Disputed	FRE 701, 802, F	
397	Batch Summary 3/1/2011 for work 2/27/2011 <b>GEO-State 083231-083255</b>	Stipulated	Disputed	FRE 701, 802, F	
398	Batch Summary 12/6/2012 for work 12/5/2012 <b>GEO-State 113994-114030</b>	Stipulated	Disputed	FRE 701, 802, F	
399	Batch Summary 12/21/2012 for work 12/20/2012 <b>GEO-State 114558-114600</b>	Stipulated	Disputed	FRE 701, 802, F	
400	Batch Summary 2/28/2013 for work 2/27/2013 <b>GEO-State 117134-117171</b>	Stipulated	Disputed	FRE 701, 802, F	
401	Batch Summary 3/14/2013 for work 3/13/2013 <b>GEO-State 117629-117663</b>	Stipulated	Disputed	FRE 701, 802, F	
402	Batch Summary 12/8/2014 for work 12/5/2014 <b>GEO-State 150279-150309</b>	Stipulated	Disputed	FRE 701, 802, F	

403	Batch Summary 12/22/2014 for work 12/20/2014 <b>GEO-State 150759-150785</b>	Stipulated	Disputed	FRE 701, 802, F	
404	Batch Summary 3/2/2015 for work 2/27/2015 <b>GEO-State 152988-153019</b>	Stipulated	Disputed	FRE 701, 802, F	
405	Batch Summary 3/12/2015 for work 3/11/2015 <b>GEO-State 155516</b>	Stipulated	Disputed	FRE 701, 802, F	
406	Batch Summary 12/6/2016 for work 12/5/2016 <b>GEO-State 225507-225552</b>	Stipulated	Disputed	FRE 701, 802, F	
407	Batch Summary 5/26/2017 for work 5/25/2017 <b>GEO-State 185834-185871</b>	Stipulated	Disputed	FRE 701, 802, F	
407 A	Daily Detainee Worker Pay Sheet for 5/25/17 for Pod G3 - <b>GEO-State 185860</b>				
408	Batch Summary 7/24/2017 for work 7/22/2017 <b>GEO-State 188980-189017</b>	Stipulated	Disputed	FRE 701, 802, F	
408 A	Daily Detainee Worker Pay Sheet for 7/22/17 for Pod G3 - <b>GEO-State 189008</b>				
409	VWP Work Roster (except kitchen) 10/31/2017 <b>GEO-State 264894-264910</b>	Stipulated	Disputed	FRE 701, 802, F	
410	VWP Work Roster (except kitchen) 12/1/2017 <b>GEO-State 264873-264892</b>	Stipulated	Disputed	FRE 701, 802, F	
411	VWP Work Schedule/Roster (except kitchen) 12/26/17 <b>GEO-Nwauzor 066545-066569</b>	Stipulated	Disputed	FRE 701, 802, F	
412	VWP Work Schedule/Roster (except kitchen) 01/02/18 <b>GEO-Nwauzor 066387-066398</b>	Stipulated	Disputed	FRE 701, 802, F	
413	VWP Work Roster (except kitchen) 2/2/2018 <b>GEO-State 229987-230005</b>	Stipulated	Disputed	FRE 701, 802, F	
414	VWP Work Roster (except kitchen) 2/6/2018 <b>GEO-State 051606- 051627</b>	Stipulated	Disputed	FRE 701, 802, F	
415	VWP Work Roster (except kitchen) 2/20/2018 <b>GEO-State 051669-051684</b>	Stipulated	Disputed	FRE 701, 802, F	

416	VWP Work Roster (except kitchen) 3/6/18 <b>GEO-State 051685-015705</b>	Stipulated	Disputed	FRE 701, 802, F	
417	VWP Work Roster (except kitchen) 3/9/18 <b>GEO-State 051706- 051724</b>	Stipulated	Disputed	FRE 701, 802, F	
418	VWP Work Roster (except kitchen) 3/16/18 <b>GEO-State 051745- 051769</b>	Stipulated	Disputed	FRE 701, 802, F	
419	Removevd				
420	Removed				
421	Removed				
422	House Unit Photograph <b>WA00030768</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
423	2018-02-05 Defendant GEO's Responses to Washington's First Requests for Admission	Stipulated	Disputed	FRE 402, 701, 802, F	
424	2018-12-20 Defendant GEO's Responses to Washington's Second Requests for Admission	Stipulated	Disputed	FRE 402, 701, 802, F	
425	2018-02-05 Defendant GEO's Responses to Washington's First Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
426	2018-07-12 Defendant GEO's Responses to Washington's Second Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
427	2018-12-20 Defendant GEO's Responses to Washington's Third Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
428	2019-06-21 Defendant GEO's Supplemental Reponses to Washington's First, Second, Third Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
429	2019-11-21 Defendant GEO's Amended Responses to Washington's Second Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
430	Kitchen Photograph <b>WA00030102</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
431	Kitchen Photograph <b>WA00029909</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
432	Kitchen Photograph <b>WA00029900</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

433	Kitchen Photograph <b>WA00029967</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
434	Kitchen Photograph <b>WA00030053</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
435	Kitchen Photograph <b>WA00030082</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
436	Kitchen Photograph <b>WA00029997</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
437	Kitchen Photograph <b>WA00031034</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
438	Kitchen Photograph <b>WA00029901</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
439	Kitchen Photograph <b>WA00029904</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
440	Kitchen Photograph <b>WA00029910</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
441	Removed				
442	Kitchen Photograph <b>WA00029920</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
443	Removed				
444	Kitchen Photograph <b>WA00029929</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
445	Kitchen Photograph <b>WA00029932</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
446	Kitchen Photograph <b>WA00029951</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
447	Kitchen Photograph <b>WA00029959</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
448	Kitchen Photograph <b>WA00029975</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
449	Kitchen Photograph <b>WA00029981</b>	Stipulated	Disputed	FRE 402, 701, 802, F	



450	Kitchen Photograph <b>WA00029992</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
451	Kitchen Photograph <b>WA00030010</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
452	Kitchen Photograph <b>WA00030037</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
453	Kitchen Photograph <b>WA00030046</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
454	Kitchen Photograph <b>WA00030047</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
455	Kitchen Photograph <b>WA00030057</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
456	Kitchen Photograph <b>WA00030061</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
457	Kitchen Photograph <b>WA00030105</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
458	Kitchen Photograph <b>WA00030110</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
459	Kitchen Photograph <b>WA00030119</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
460	Kitchen Photograph <b>WA00030141</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
461	Kitchen Photograph <b>WA00030145</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
462	Removed				
463	Recreation Area Photograph <b>WA00030209</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
464	Recreation Area Photograph <b>WA00030212</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
465	Recreation Area Photograph <b>WA00030235</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
466	Recreation Area Photograph <b>WA00030346</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

467	Removed				
468	Recreation Area Photograph <b>WA00031006</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
469	Recreation Area Photograph <b>WA00031008</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
470	Recreation Area Photograph <b>WA00031019</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
471	Removed				
472	Recreation Area Photograph <b>WA00030219</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
473	Grey Mile Photograph <b>WA00029761</b>	Stipulated	Stipulated		
474	Grey Mile Photograph <b>WA00029881</b>	Stipulated	Stipulated		
475	Grey Mile Photograph <b>WA00030519</b>	Stipulated	Stipulated		
476	Grey Mile Photograph <b>WA00031156</b>	Stipulated	Stipulated		
477	Clipboard with Grey Mile Duties <b>WA00030731</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
478	Grey Mile Photograph <b>WA00030394</b>	Stipulated	Stipulated		
479	Grey Mile Photograph <b>WA00030522</b>	Stipulated	Stipulated		
480	Grey Mile Photograph <b>WA00030523</b>	Stipulated	Stipulated		
481	Grey Mile Photograph <b>WA00030728</b>	Stipulated	Stipulated		
482	Grey Mile Photograph <b>WA00030729</b>	Stipulated	Stipulated		
483	Grey Mile Photograph <b>WA00030733</b>	Stipulated	Stipulated		
484	Grey Mile Photograph	Stipulated	Stipulated		

	<b>WA00031086</b>				
485	Grey Mile Photograph <b>WA00031088</b>	Stipulated	Stipulated		
486	Grey Mile Photograph <b>WA00031089</b>	Stipulated	Stipulated		
487	Grey Mile Photograph <b>WA00031092</b>	Stipulated	Stipulated		
488	Grey Mile Photograph <b>WA00031094</b>	Stipulated	Stipulated		
489	Grey Mile Photograph <b>WA00031098</b>	Stipulated	Stipulated		
490	Grey Mile Photograph <b>WA00031100</b>	Stipulated	Stipulated		
491	Grey Mile Photograph <b>WA00031158</b>	Stipulated	Stipulated		
492	Grey Mile Photograph <b>WA00031159</b>	Stipulated	Stipulated		
493	Grey Mile Photograph <b>WA00031160</b>	Stipulated	Stipulated		
494	Interior Photograph <b>WA00030987</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
495	Interior Photograph <b>WA00030999</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
496	Interior Photograph <b>WA00031023</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
497	Interior Photograph <b>WA00031033</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
498	Interior Photograph <b>WA00031050</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
499	Interior Photograph <b>WA00031063</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
500	Interior Photograph <b>WA00031066</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

501	Interior Photograph <b>WA00031068</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
502	Interior Photograph <b>WA00031076</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
503 to 518	Removed				
519	Photographs of the detainee living areas <b>WA00030418</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
520	Photographs of the detainee living areas <b>WA00030425</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
521	Photographs of the detainee living areas <b>WA00030419</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
522	Photographs of the detainee living areas <b>WA00030414</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
523	Photographs of the detainee living areas <b>WA00030496</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
524	Photographs of the detainee living areas <b>WA00030451</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
525	House Unit Photograph <b>WA00030684</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
526	Kitchen Photograph <b>WA00030632</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
527	Kitchen Photograph <b>WA00030808</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
528	Kitchen Photograph <b>WA00030075</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
529	Payroll Transactions 1/1/2013-2/1/2013 <b>GEO-State 297977</b>	Stipulated	Disputed	FRE 701, 802, F	
530	Payroll Transactions 5/1/2017-6/1/2017 <b>GEO-State 298611</b>	Stipulated	Disputed	FRE 701, 802, F	
531	Marquez-Zavalza Payroll Transactions 5/1/2017-6/1/2017	Stipulated	Disputed	F, T	

532	Payroll Transactions 6/1/2017-7/1/2017 <b>GEO-State 298624</b>	Stipulated	Disputed	FRE 701, 802, F	
533	Marquez-Zavalza Payroll Transactions 6/1/2017-7/1/2017	Stipulated	Disputed	F, T	
534	Payroll Transactions 8/1/2017-9/1/2017 <b>GEO-State 298650</b>	Stipulated	Disputed	FRE 701, 802, F	
535	Marquez-Zavalza Payroll Transactions 8/1/2017-9/1/2017	Stipulated	Disputed	F, T	
536	Payroll Transactions 9/1/2017-10/1/2017 <b>GEO-State 298663</b>	Stipulated	Disputed	FRE 701, 802, F	
537	Marquez-Zavalza Payroll Transactions 9/1/2017-10/1/2017	Stipulated	Disputed	F, T	
538	Payroll Transactions 10/1/2017-11/1/2017 <b>GEO-State 298688</b>	Stipulated	Disputed	FRE 701, 802, F	
539	Marquez-Zavalza Payroll Transactions 10/1/2017-11/1/2017	Stipulated	Disputed	F, T	
540	Payroll Transactions 2/1/2018-3/1/2018 <b>GEO-State 297465</b>	Stipulated	Disputed	FRE 701, 802, F	
541	Lopez-Paez Payroll Transactions 2/1/2018-3/1/2018	Stipulated	Disputed	T	
542	Payroll Transactions 4/1/2018-5/1/2018 <b>GEO-State 297466</b>	Stipulated	Disputed	FRE 701, 802, F	
543	Lopez-Paez Payroll Transactions 4/1/2018-5/1/2018	Stipulated	Disputed	T	
544	Payroll Transactions 5/1/2018-6/1/2018 <b>GEO-State 297467</b>	Stipulated	Disputed	FRE 701, 802, F	
545	Lopez-Paez Payroll Transactions 5/1/2018-6/1/2018	Stipulated	Disputed	T	
546	Payroll Transactions 6/1/2018-7/1/2018 <b>GEO-State 297468</b>	Stipulated	Disputed	FRE 701, 802, F	
547	Lopez-Paez Payroll Transactions 6/1/2018-7/1/2018	Stipulated	Disputed	T	

548	Payroll Transactions 07/1/2018-8/1/2018 <b>GEO-State 297469</b>	Stipulated	Disputed	FRE 701, 802, F	
549	Lopez-Paez Payroll Transactions 7/1/2018-8/1/2018	Stipulated	Disputed	T	
550	Payroll Transactions 10/1/2018-11/1/2018 <b>GEO-State 297472</b>	Stipulated	Disputed	FRE 701, 802, F	
551	Lopez-Paez Payroll Transactions 10/1/2018-11/1/2018	Stipulated	Disputed	T	
552	Payroll Transactions 2/1/2019-3/1/2019 <b>GEO-State 297477</b>	Stipulated	Disputed	FRE 701, 802, F	
553	Lopez-Paez Payroll Transactions 2/1/2019-3/1/2019	Stipulated	Disputed	T	
554	Payroll Transactions 5/1/2019-6/3/2019 <b>GEO-State 297478</b>	Stipulated	Disputed	FRE 701, 802, F	
555	Lopez-Paez Payroll Transactions 5/1/2018-6/3/2018	Stipulated	Disputed	T	
556	Payroll Transactions 6/1/2019-7/1/2019 <b>GEO-State 297479</b>	Stipulated	Disputed	FRE 701, 802, F	
557	Lopez-Paez Payroll Transactions 6/1/2018-7/1/2018	Stipulated	Disputed	T	
558	Payroll Transactions 7/1/2019-8/1/2019 <b>GEO-State 297480</b>	Stipulated	Disputed	FRE 701, 802, F	
559	Lopez-Paez Payroll Transactions 7/1/2018-8/1/2018	Stipulated	Disputed	T	
560	Payroll Transactions 9/1/2019-10/1/2019 <b>GEO-State 297481</b>	Stipulated	Disputed	FRE 701, 802, F	
561	Lopez-Paez Payroll Transactions 9/1/2018-10/1/2018	Stipulated	Disputed	T	
562	Removed				
563	Appendix A to Nickerson Second Supplemental Report (CV, firm descriptions, prior testimony) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	

564	Appendix B to Nickerson Second Supplemental Report (List of files reviewed) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
565	Attachment 1 to Nickerson Second Supplemental Report (Dep. Exhibit 20) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
566	Attachment 2 to Nickerson Second Supplemental Report (List of Data Sources for Amounts Paid to Detainees) Cumulative Summary <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	

567	Attachment 3 to Nickerson Second Supplemental Report (Washington Minimum Wage by Year) Cumulative Summary <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
568	Attachment 4 to Nickerson Second Supplemental Report (Prevailing Wages –occupation, mapping, date, wage, and source) Cumulative Summary <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
569	Attachment 5 to Nickerson Second Supplemental Report (Dep. Exhibit 20 - Annotated with occupational categories and additional details with shift length estimates) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
570	Attachment 6 to Nickerson Second Supplemental Report	Stipulated	Disputed	FRE 402, 702, 802, 609, F	

	(Percentage of Total Hours Worked by Occupation and the Applicable Prevailing Wage for January 1, 2013 – September 30, 2019) <b>Phase 3 only</b>				
571	Attachment 7 to Nickerson Second Supplemental Report (Fair Wage Analysis: January 1, 2013 to September 30, 2019) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
572	Attachment 8 to Nickerson Second Supplemental Report (Fair Wage Analysis: October 1, 2005 to December 31, 2012) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
573	Attachment 9 to Nickerson Second Supplemental Report (Fair Wage Analysis: October 1, 2019 to April 10, 2020) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
574	Attachment 10 to Nickerson Second Supplemental Report (Fair Wage Analysis by Year) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
575	Attachment 11.1 to Nickerson Second Supplemental Report (WA Minimum Wage Effects) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
576	Attachment 11.2 to Nickerson Second Supplemental Report (Prevailing Wage Effects) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	



577	Attachment 12 to Nickerson Second Supplemental Report (GEO-State 299185) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
578	Attachment 13.1 to Nickerson Second Supplemental Report (Actual Revenue and Gross Profit for NWDC Compared to Revenue and Gross Profit Adjusted for Additional Cost of Fair Wages) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
579	Attachment 13.2 to Nickerson Second Supplemental Report (Actual Revenue and Net Profit for NWDC Compared to Revenue and Net Profit Adjusted for Additional Cost of Fair Wages) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
580	Attachment 13.3 to Nickerson Second Supplemental Report (Actual Revenue and Gross Profit for NWDC Compared to Revenue and Gross Profit Adjusted for Additional Cost of Minimum Wages and FICA) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
581	Attachment 13.4 to Nickerson Second Supplemental Report (Actual Revenue and Net Profit for NWDC Compared to Revenue and Net Profits Adjusted for Additional Cost of Minimum Wages and FICA) <b>Phase 3 only</b>	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
585	House Unit Photograph <b>WA00030440</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
586	House Unit Photograph <b>WA00030442</b>	Stipulated	Disputed	FRE 402, 701, 802, F	

587	House Unit Photograph <b>WA00030449</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
588	House Unit Photograph <b>WA00030452</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
589	House Unit Photograph <b>WA00030467</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
590	House Unit Photograph <b>WA00030473</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
591	House Unit Photograph <b>WA00030485</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
592	House Unit Photograph <b>WA00030505</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
593	House Unit Photograph <b>WA00030509</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
594	House Unit Photograph <b>WA00030530</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
595	House Unit Photograph <b>WA00030542</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
596	House Unit Photograph <b>WA00030598</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
597	House Unit Photograph <b>WA00030603</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
598	House Unit Photograph <b>WA00030623</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
599	House Unit Photograph <b>WA00030661</b>	Stipulated	Disputed	FRE 402, 701, 802, F	
600	Deposition Exhibit 600, GEO's 2019 10-K filing <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 408; FRE 402, FRE 403, 802, MIL, F	
601	PBNDS 2011 Inspection Sheet (Ragsdale Deposition Exhibit 601, produced as GEO-State 015848)	Stipulated	Disputed		

602	Financial Calculations underlying Exhibit 365, produced as GEO-State 299198 - native format excel spreadsheet and PDF of same	Disputed	Disputed	FRE 408; FRE 402, FRE 403, 802, MIL, F	
602 A	602 Tab A – Detainee volunteers (annual impact of paying detainees minimum wage) (PDF)	Disputed	Disputed	FRE 408; FRE 402, FRE 403, 802, MIL, F	
602 B	602 Tab B - Summary of the annual impact of replacing detainees with GEO employees (PDF)	Disputed	Disputed	FRE 408; FRE 402, FRE 403, 802, MIL, F	
602 C	602 Tab C - Tacoma (ICE Tacoma 1575 beds)(Replace Detainee Volunteers with GEO Employees) (PDF)	Disputed	Disputed	FRE 408; FRE 402, FRE 403, 802, MIL, F	
602 D	602 Tab D - Staffing analysis of what it would cost to replace detainee workers at the NWDC (PDF)	Disputed	Disputed	FRE 408; FRE 402, FRE 403, 802, MIL, F	
603	Chris Strawn Resume	Disputed	Disputed	FRE 403,802, MIL, F	
604	Appendix D to Munson’s Supplemental Expert Report <b>NWAUZOR ONLY / Phase 2 only</b>	Disputed	Disputed	FRE 401; FRE 402, FRE 403, 703, 802, MIL, F	
605	Keefe Banking Data <b>GEO-Nwauzor 193073 through GEO-Nwauzor_193132</b> <b>Phase 2 and/or 3 only</b>	Stipulated	Disputed	FRE 401, 402, F	

606	Supplemental Keefe Banking Data (to be produced by GEO) <b>Phase 2 and/or 3 only</b>	Disputed	Disputed	FRE 401, 402, F	
607	Detainee Kite #2,193,425 Sent to ICE 9/30/17, Received by ICE and closed 10/3/17. Page GEO-State 300224				
608	Map of Nigeria (Nwauzor)				
609	Admitted Facts				

### Parties' Objection Codes

C. Confidential. GEO objects to the admissibility of certain confidential documents (or pages of documents), but is amenable to stipulating to their admissibility at trial, provided the confidentiality can be preserved outside of the courtroom.

F. Foundation.

MIL. The party objects based upon a MIL ruling.

T. Testimony. GEO has disputed the admissibility of certain documents, but will stipulate to their admissibility provided the witness testifies at trial and is available for cross-examination.

## Defendant's Exhibits

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-1	Email thread between Tammy Fellin and other L&I employees <b>GEO-Nwauzor 191936</b> <b>WA00009253</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-2	Email thread between Tammy Fellin and Sandy Mullin <b>GEO-Nwauzor 192040</b> <b>GEO-Nwauzor 192250</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-3	Email thread between Tammy Fellin and Sandy Mullin <b>GEO-Nwauzor 192142</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-4	Email from Fellin to Mullin <b>WA00009361</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-5	Email from Orlando Marquez Washington AG's office. <b>WA00003618</b>	Stipulated	Disputed	FRE 402, 403, 802	
A-7	Memo from City of Tacoma <b>WA00005404</b>	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-8	Email from Sandy Mullins re: applicability of WMWA to detainees <b>WA00009260</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-9	GEO's 2017 Business License Renewal (City of Tacoma) <b>WA00006606</b>	Disputed	Disputed	FRE 402, 403, 802, 902, F	
A-10	Letter from ICE to City of Tacoma <b>WA00002514</b>	Disputed	Disputed	FRE 402, 403, 802, F	
A-12	Email to Bill Pfeifer from Lauren Walker Lee, Tacoma City Counsel.	Disputed	Disputed	FRE 402, 403, 802, F	

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
	<b>WA00008106</b>				
A-13	Northwest Detention Center Handbook 8/2016 SIGNED <b>WA00008640</b>	Stipulated	Stipulated		
A-14	Special Commitment Center Residential Vocational Program Policy <b>WA00011892-902</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-15 to A-22	Removed				
A-23	GEO's Contract with the Washington Department of Corrections (May 2015) <b>WA00011357-495</b>	Disputed	Disputed	FRE 402, 403, 802, F	
A-24 to A-55	Removed				
A-56	"Our Mission" Correctional Industries <b>WA00010184-85</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-57 to A-94	Removed				
A-95	Department of Corrections Job Flyer <b>WA00012021</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-96	Invitation for Applications For Monroe Correctional Complex <b>WA00012150-181</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-97	DOC Employment Flyer <b>WA00012272</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-98	Interagency Contract with Puyallup Tribal Police Department <b>WA00012397-411</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-99	Interagency Agreement Chelan County and Washington State Department of Corrections (2018) <b>WA00012433-455</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-100	Interagency Agreement King County and Washington State Department of Corrections (2013) <b>WA00013182-220</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-101	Interagency Agreement between the Confederated Tribes of Chehalis and the Washington Department of Corrections (2016) <b>WA00013489-529</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-102	Progress House Work Release Contract (2017) <b>WA00014335-367</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-103	Helen B. Ratcliff Work Release Contract (2017) <b>WA00014368-396</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-104	Bishop Lewis Work Release Contract (2017) <b>WA00014429-459</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-105	Removed				
A-106	Email from Suchi Sharma to Lynne Buchanan <b>WA00015595-596</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-107	Email from Lynne Buchanan to Elizabeth Smith, March 11, 2014 <b>WA00015597-598</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-108	Email from Joel Sacks to Tammy Fellin <b>WA00015611</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-109	Email from Lynne Buchanan to David Johnson <b>WA00017694</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-110	Email from Tammy Fellin to Sandy Mullin (4.14.2014) <b>WA00017738</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-111 to A-114	Removed				
A-115	Email from Suchi Sharma to Suchi Sharma <b>WA00017955</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-116	Email from Matthew Erlich to Carlena Anderson (5.28.14) <b>WA00018810</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-117	Email from Suchi Sharma to Tammy Fellin <b>WA00019175</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-118	Email from David Johnson to Melissa Grondahl (5.4.2016)	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	



Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
	<b>WA00019244</b>				
A-119 to A-138	Removed				
A-139	Email from David Johnson to Russell Hauss <b>WA00019297</b>	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-140 to A-151	Removed				
A-152	Dayroom Janitor Job Description <b>WA00020870</b>	Disputed	Disputed	MIL, FRE 402, 403, 802, F	
A-153 to A-216	Removed				

A-219	Photographs <b>WA00029769-71</b>	Disputed	Disputed	FRE 901	
A-223	Letter from Attorney General of Washington, November 30, 2018. <b>ECF 220-1</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-224 to A-227	Removed				
A-230	Disability Rights Washington Letter, December 15, 2014 <b>Exhibit 340 to Grice 30(b)(6) Dep.</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-231	Compilation of E-Mail	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	

	<b>Exhibit 263 to Wonhoff 30(b)(6) Dep.</b>				
A-232	SCC Final report <b>Exhibit 338 to Eagle 30(b)(6) Deposition</b>	Stipulated	Disputed	MIL, FRE 402, 403, 802, F	
A-233	Removed				
A-234	Volunteer Work Program Agreement <b>GEO-Nwauzor 015631</b> (better image quality than Plaintiffs' Exhibit 229)	Stipulated	Stipulated		
A-235	Voluntary Facilities Activities Program 5.1.2 Effective July 28, 2019	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-236	Video of Detainee VWP Participant <b>GEO-State 300754</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-237	Video of Detainee VWP Participant <b>GEO-State 300755</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-238	Video of Detainee VWP Participant <b>GEO-State 300756</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-239	Video of Detainee VWP Participant <b>GEO-State 300757</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-240	Video of Detainee VWP Participant <b>GEO-State 300758</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-241	Video of Detainee VWP Participant <b>GEO-State 300759</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-242	Video of Detainee VWP Participant <b>GEO-State 300760</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-243	Video of Detainee VWP Participant <b>GEO-State 300761</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	

A-244	Video of Detainee VWP Participant <b>GEO-State 300762</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-245	Video of Detainee VWP Participant <b>GEO-State 300763</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-246	Video of Detainee VWP Participant <b>GEO-State 300764</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-247	Video of Detainee VWP Participant <b>GEO-State 300765</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-248	Video of Detainee VWP Participant <b>GEO-State 300766</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-249	Video of Detainee VWP Participant <b>GEO-State 300767</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-250	Video of Detainee VWP Participant <b>GEO-State 300768</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-251	Video of Detainee VWP Participant <b>GEO-State 300769</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-252	Video of Detainee VWP Participant <b>GEO-State 300770</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-253	Video of Detainee VWP Participant <b>GEO-State 300771</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-254	Video of Detainee VWP Participant <b>GEO-State 300772</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-255	Video of Detainee VWP Participant <b>GEO-State 300773</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-256	Video of Detainee VWP Participant <b>GEO-State 300774</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-257	Video of Detainee VWP Participant <b>GEO-State 300775</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-258	Video of Detainee VWP Participant <b>GEO-State 300776</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	

A-259	Video of Detainee VWP Participant <b>GEO-State 300777</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-260	Video of Detainee VWP Participant <b>GEO-State 300778</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-261	Video of Detainee VWP Participant <b>GEO-State 300779</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-262	Video of Detainee VWP Participant <b>GEO-State 300780</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-263	Video of Detainee VWP Participant <b>GEO-State 300781</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-264	Video of Detainee VWP Participant <b>GEO-State 300782</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-265	Video of Detainee VWP Participant <b>GEO-State 300783</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-266	Video of Detainee VWP Participant <b>GEO-State 300784</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A-267	Removed				
A-268	Karla Gomez-Soto Detainee File Documents <b>(Produced in Vol. 20)</b>	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-269 to A-270	Removed				
A-271	Orlando Marquez-Zavalsa VWP Documents <b>(Produced in Vol. 20)</b>	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-272	Jose Medina-Lara Detainee file Documents <b>(Produced in Vol. 20)</b>	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-273	Removed				

A-274	Removed				
A-275	VWP Policy & Procedure 5.1.2 Effective 4/18/14 – Ex. 197 with sticker crossed out and Signature page added	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A276	Photos of murals (3) with sports theme	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A277	Signature Page for 5.1.2. VWP Policy & Procedure	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A278	4 Signature pages for 5.1.2 VWP Policy & Procedure	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A279	Detainee in Hall with partial mural on wall	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A280	Mural Photo	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A281	Signature page for 5.1.2 VWP Policy & Procedure – Same as A277	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A282	Signature page for 5.1.2.VWP Policy & Procedure – Same as A281 and A277	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A283	C.I. Foods Brochure	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A284	Food Product List	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A285	Jail Menu Plan	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A286	VWP Agreement in Spanish Dated 4/25/17 – Document marked A-271 38 of 38 at the top as well.	Stipulated	Stipulated		

A287	Detainee Kite – Orlando Marquez – Worker Program #1,865,209 Dated 5/31/17 Marked A-271 36 of 38	Stipulated	Stipulated		
A288	Resident Account Summary – Orlando Marquez – Printed 4/5/21 for dates 4/26/17 – 12/1/17	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A289	Refusal to Work Form – Dated 6/16/17 marked A-271 33 of 38	Stipulated	Stipulated		
A290	Detainee Kite – Orlando Marquez – Worker Program #1,980,257 Dated 7/16/17 marked A-271 32 of 38	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A291	Detainee Kite – Orlando Marquez – Worker Program #1,999,928 Dated 7/24/17 marked A-271 31 of 38	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A292	Detainee Kite – Orlando Marquez – Worker Program #2,029,936 Dated 8/3/17 marked A-271 29 of 38	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A293	Refusal to Work Form – Dated 10/2/17 marked A-271 26 of 38	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A294	Refusal to Work Form – Dated 10/23/17 marked A-271 2 of 38	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A295	Detainee Kite #1,852,235 Sent to ICE, Received by ICE and closed 05/26/17. (Orlando Marquez) Page GEO-State 300271	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-296	VWP Agreement 4/23/18 Gomez-Soto Geo-State 299875	Stipulated	Stipulated		
A-297	Detainee Kite #2,849,714 Sent to ICE, Received by ICE 5/2/18 and closed 05/4/17. (Gomez-Soto) Page GEO-State 299784	Stipulated	Stipulated		
A-298	Refusal to Work Form – Dated 6/5/18 GEO-State 299776	Stipulated	Stipulated		

A-299	VWP Agreement 10/4/18 Gomez-Soto	Stipulated	Stipulated		
A-300	Detainee Job Description – Laundry Worker Signed 10/4/18 GEO-State 299756	Stipulated	Stipulated		
A-301	Pod Porter Job Description – signed by Nwauzor 11/10/16	Stipulated	Stipulated		
A-302	Resident Account Summary – for Nwauzor - Printed 4/5/21 covering dates: 5/25/16 – 1/24/17	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-303	VWP Agreement for Nwauzor signed 11/10/16	Stipulated	Stipulated		
A304	ESDWAGOV- Citizenship and legal rights	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A305	2017 Sep 18 Email from Tammy Fellin – ACP – NWDC Memo REDACTED	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A306	L&I Organization Chart	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A307	RCW 49.46.010	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A308	2015_0715 Minimum Wage Act Applicability	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A309	2014-04 Ch. 4 DOL Employment Standards Operations Manual	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A310	2014-05 Ch. 12 DOL Employment Standards Operations Manual	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A311	2014-1215 Letter to Joel Sacks from Disability Rights Washington	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A312	2011-1028 Evaluation of Cost-Effective Provision of Services for	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	

	the Special Commitment Center McNeil Island				
A313	Blank Log of Work-Related Injuries and Illnesses	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A314	2020-1228 Defendant's Answer to 2 <sup>nd</sup> Amended Class Action Complaint for Declaratory Injunctive Relief – John Anderson et. al. v. Cheryl Strange in her official capacity as Secretary of DSHS	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A315	2015 Certification of Enrollment SB 6052 Passed 6/29/15	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A316	RCW 72.09.100 Inmate Work Program – Classes of Work – Participation - Benefits	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A317	Washington State Correctional Industries – Eligible Customers – Contact Us	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A318	2014-0220 Enforcement Case File Info –Complaint Re: Exposure to Sharps and razor blades	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A319	Blank OSHA Form 300 – Log of Work-Related Injuries and Illnesses	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A320	Removed				
A321	Minimum Wage Act Applicability – ES.A.1 12/29/20	Stipulated	Disputed	MIL, FRE 402, 403, 701, 802, F	
A322	Email between Tammi Fellin and Victoria Kennedy from March 2014 <i>Washington ECF 557-8</i>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A323	Email from Matthew Erlich to Mores re:L&I authority over detainees	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	



	<i>Washington ECF 557-3</i>				
A324	Email thread from Dave Johnson Department of L&I October 217 <i>Washington ECF 557-4;</i> <b>WA00019316</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A325	Redacted 2009 Memorandum of Attorney General <i>Washington ECF 557-6</i>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A326	Email from Fellin to Suchi Sharma <i>Washington ECF 557-6</i>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A327	State's Supplemental Response to GEO's First RFAs, November 2018	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A328	State's Responses to GEO's 1 <sup>st</sup> RFAs, August 2018	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A329	State's Second Supplemental Response to GEO's First Interrogatories November, 2018	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A330	Chen's answers and Responses to GEO's Interrogatories and Requests for Production, January 2018	Disputed	Disputed	FRE 402, 403, F	
A331	ICE Inspection of GEO <b>Chen_000448</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A332	Email from David Johnson to Joshua Grice December 2018 <b>PRR 140694 Installment 2 Page 163</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A333	Email from David Johnson to Sergio Flores <b>PRR 140694 Page 162</b>	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	
A334	Email from David Johnson to Elizabeth Smith August 2018	Disputed	Disputed	MIL, FRE 402, 403, 701, 802, F	

	<b>PRR 140694 Installment 2 Page 158</b>				
A335	US Immigration and Customs Enforcement and Removal Operations: COVID-19 Pandemic Response Requirements March 16, 2021	Disputed	Disputed	FRE 402, 403, 701, 802, F	

### Parties' Objection Codes

C. Confidential. GEO objects to the admissibility of certain confidential documents (or pages of documents), but is amenable to stipulating to their admissibility at trial, provided the confidentiality can be preserved outside of the courtroom.

F. Foundation.

MIL. The party objects based upon a MIL ruling or pending motion.

T. Testimony. GEO has disputed the admissibility of certain documents, but will stipulate to their admissibility provided the witness testifies at trial and is available for cross-examination.